

cc: MV

Louisiana Public Service Commission



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COMMISSIONERS

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Telephone: 225-342-9888

BRANDON M. FREY
Executive Secretary
Executive Counsel

JOHNNY E. SNELGROVE, JR.
Deputy Undersecretary

October 12, 2018

VIA HAND DELIVERY

Ms. Terri Bordelon
Louisiana Public Service Commission
Records and Recordings
602 N. Fifth Street
Galvez Building, 12th Floor
Baton Rouge, LA 70802

2018 OCT 12 PM 4:04
LA PUBLIC SERVICE
COMMISSION

**Re: Docket No. U-34966 Entergy Louisiana, LLC, Cleco Power LLC and
Southwestern Electric Power Company**

Dear Ms. Bordelon:

Enclosed please find the Public Version of an *Unopposed Joint Motion for Acceptance into the Record of Proposed Uncontested Stipulated Settlement in Support of Application*. The Confidential Version is being filed under seal.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Melissa Watson
Deputy General Counsel

MW/kst
Encl.

cc: Service List

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

2018 OCT 12 PM 4:04
LA PUBLIC SERVICE
COMMISSION

IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC POWER)
COMPANY FOR APPROVAL OF)
TOLEDO BEND)
HYDROELECTRIC POWER SALES)
AGREEMENT)

DOCKET NO. U-34966

**UNOPPOSED JOINT MOTION FOR
ACCEPTANCE INTO THE RECORD OF PROPOSED UNCONTESTED STIPULATED
SETTLEMENT IN SUPPORT OF APPLICATION**

NOW COMES Entergy Louisiana, LLC (“ELL” or the “Company”); Cleco Power LLC (“CLECO”); Southwestern Electric Power Company (“SWEPCO”) (collectively, the “Applicants”) and Louisiana Public Service Commission (“LPSC” or “Commission”) Staff (“Staff”), through undersigned counsel, who respectfully request that the Hearing Examiner, Chief Administrative Law Judge Melanie Verzwylt, accept the Uncontested Stipulated Settlement Term Sheet (“Stipulation”), with supporting documentation as set forth below, into the record of this proceeding and submit same to the Commission for consideration at its October 26, 2018 Business and Executive Session (“B&E”). This filing is being made pursuant to the *Ruling on Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule* issued October 8, 2018. In support of this motion, Staff and Applicants submit as follows:

I.

This Commission, having been made aware that the Applicants had entered into the Proposed Power Sales Agreement (“PSA”) with the Sabine River Authority of Louisiana and the Sabine River Authority of Texas (collectively, the “Authorities”) to replace the previous agreement

which expired April 30, 2018, issued a directive at the August 1, 2018 B&E, directing the Applicants to submit a request on or before August 7, 2018 with all supporting documentation seeking Commission approval of the PSA. The Commission also directed Staff to use best efforts to facilitate an expedited proceeding, outside of the Administrative Hearings Division process, and present the record and evidence to the Commission for a decision at the October 26, 2018 B&E.

II.

On August 7, 2018, Applicants filed their *Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement* and accompanying Direct Testimony and Exhibits (“Joint Application”), pursuant to and in accordance with LPSC General Order dated September 20, 1983 (the “1983 General Order”).¹ The Joint Application was published in the Commission’s Official Bulletin No. 1173, dated August 10, 2018. Interventions were filed by the Louisiana Energy Users Group (“LEUG”), Marathon Petroleum Company (“Marathon”), and Packaging Corporation of America (“PCA”).

III.

After conducting discovery regarding the Proposed PSA, LPSC Staff and other Parties to this proceeding filed position statements on September 28, 2018 noting that they do not oppose the Applicants’ request, with LEUG and PCA each indicating that its non-opposition to the PSA is limited to the facts and circumstances presented in the PSA. Marathon is the only party to this proceeding that did not file a statement of position. However, Marathon has authorized the

¹ LPSC General Order dated September 20, 1983 (*In re: In the Matter of the Expansion of Utility Power Plant; Proposed Certification of New Plant by the LPSC*), as amended by General Order (Corrected) in Docket No. R-30517 (*In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exception for annual and seasonal liquidated damages block energy purchases*) dated May 27, 2009.

Applicants to state that it supports the Commission's approval of the Proposed PSA. Therefore, no Party opposes the Applicants' request.

IV.

On October 5, 2018, Staff and the Applicants filed a *Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule*, which included a revised schedule allowing for a paper proceeding in lieu of an in-person hearing, in order to comply with the Commission's August 1, 2018 directive. Judge Verzwylvelt acting as Hearing Examiner issued a *Ruling on Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule* on October 8, 2018, granting the motion and revising the procedural schedule to facilitate the presentation of the record and evidence to the Commission for a decision at the October 26, 2018 B&E.

V.

Following additional meetings and discussions regarding Staff's proposed conditions, the Parties subsequently executed the Stipulation, effective October 12, 2018.

VI.

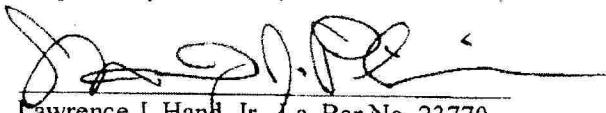
The Applicants and Staff present as the record in support of the Application in this matter the following exhibits that have been stipulated to by all parties to this proceeding:

Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement (Public Version)	Applicants' Exhibit 1, in globo
Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement (Confidential Version)	Applicants' Exhibit 2, in globo
Unopposed Joint Motion for Acceptance into the Record of Proposed Uncontested Stipulated Settlement in Support of Application	Applicants' and Staff Joint Exhibit 1
Uncontested Stipulated Settlement Term Sheet	Applicants' and Staff Joint Exhibit 2

Applicants' Affidavits in Support of Stipulation	Applicants' Exhibit 3, in globo
Position Statements on behalf of Staff, LEUG and PCA	Applicants' and Staff Joint Exhibit 3

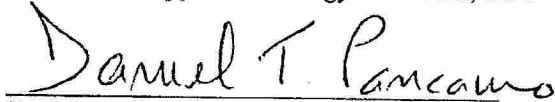
WHEREFORE, Entergy Louisiana, LLC, Cleco Power LLC, Southwestern Electric Power Company and Louisiana Public Service Commission Staff, respectfully request that the Hearing Examiner accept the stipulated exhibits listed above as the record in support of the Application in this matter and submit that record to the Commission for consideration at its October 26, 2018 Business and Executive Session, pursuant to the *Ruling on Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule* issued October 8, 2018.

Respectfully submitted,



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Michael J. Plaisance, La. Bar No. 31288
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Counsel for Applicant Entergy Louisiana, LLC



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Phelps Dunbar, L.L.P.
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Dan.pancamo@phelps.com

Counsel for Applicant Cleco Power LLC



Bobby S. Gilliam, La. Bar No. 6227
Jonathan P. McCartney, La. Bar No. 31508
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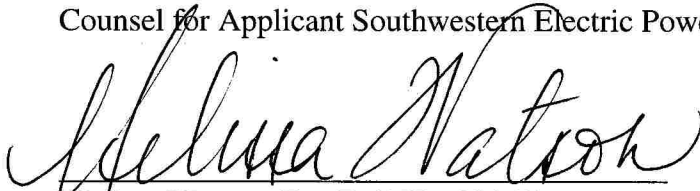
Counsel for Applicant Southwestern Electric Power Company

Melissa Watson (Bar Roll No. 28261)
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Counsel for Applicant Southwestern Electric Power Company

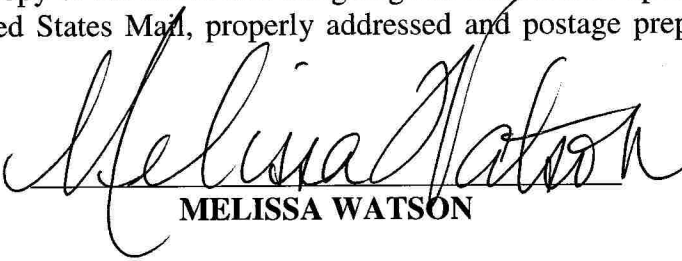
A handwritten signature in cursive script, reading "Melissa Watson". The signature is written in dark ink and is positioned above the printed name and title of the signatory.

Melissa Watson (Bar Roll No. 28261)
Deputy General Counsel
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Ph. (225) 342-9888
melissa.watson@la.gov

Counsel for Louisiana Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon all parties of record by email, fax, or United States Mail, properly addressed and postage prepaid, on October 12, 2018.



MELISSA WATSON

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC)
POWER COMPANY FOR)
APPROVAL OF TOLEDO BEND)
HYDROELECTRIC POWER)
SALES AGREEMENT)**

DOCKET NO. U-34966

APPLICANTS' EXHIBIT 1 (*in globo*)

OCTOBER 2018



August 7, 2018

By Hand Delivery

Brandon Frey, Secretary
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North 5th Street
Baton Rouge, LA 70802

**Re: In Re: Joint Application of Entergy Louisiana, LLC, Cleco Power LLC, and
Southwestern Electric Power Company for Approval of Toledo Bend
Hydroelectric Power Sales Agreement
LPSC Docket No. U-**

Dear Mr. Frey:

In response to the Commission's directive at the August 1, 2018 Business and Executive Meeting, I have enclosed the original and three copies of a Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement, which is being filed jointly on behalf of Entergy Louisiana, LLC ("ELL"); Cleco Power LLC ("CLECO") and Southwestern Electric Power Company ("SWEPCO") (collectively, the "Applicants"). In so directing, the Commission acknowledged that this Joint Application is to be considered outside of the Administrative Hearings Division process. Accordingly, the Applicants request that the Commission exercise its original jurisdiction over this matter without the typical delays of the Administrative Hearings process by expediting its review of the Joint Application so that the Commission can consider this Joint Application at its October 2018 B&E. The Applicants also request a shortened intervention period of no more than 10 days.

This Joint Application is supported by the non-confidential affidavits of Paul J. Girard, III, J. Robert Cleghorn, and Thomas Brice, on behalf of ELL, CLECO, and SWEPCO, respectively. Please retain the original and two copies for your files and return a date-stamped copy to our by-hand courier.

Also enclosed are five copies of the Confidential Version of the referenced filing, which is being provided to you under seal pursuant to the provisions of the LPSC General Order dated August 31, 1992, and Rules 12.1 and 26 of the Commission's Rules of Practice and Procedure. The confidential materials included in the filing consist of competitively sensitive cost and market information, the disclosure of which may create an artificial target for suppliers in an otherwise competitive wholesale market and includes financial projections that are required to be

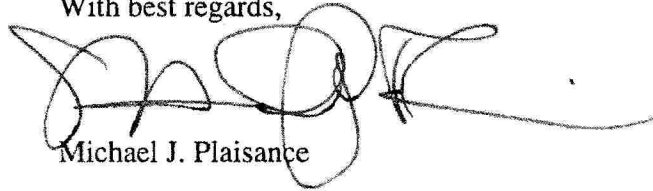
Mr. Brandon Frey
August 7, 2018
Page 2

provided on a confidential basis. For this reason, this material is confidential and commercially sensitive. The public disclosure of the information contained herein would subject not only the Applicants, but also their customers, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential.

Please retain the original Confidential Version for your files and return a date-stamped copy to our by-hand courier. Additional copies of the Confidential Version of this filing will be provided to the appropriate representatives of the Louisiana Public Service Commission Staff and made available to intervenors once a suitable Confidentiality Agreement has been executed by the parties.

If you have any questions, please do not hesitate to call me. Thank you for your courtesy and assistance with this matter.

With best regards,

A handwritten signature in black ink, appearing to read 'Michael J. Plaisance', with a long horizontal flourish extending to the right.

Michael J. Plaisance

Enclosures

cc: All Commissioners (public version only)
Melissa Watson, Esq.
J. Robert Cleghorn
Dan Pancamo
Emile Cordaro
Bobby S. Gilliam
Jonathan P. McCartney

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: JOINT APPLICATION OF)	
ENTERGY LOUISIANA, LLC,)	
CLECO POWER LLC, AND)	
SOUTHWESTERN ELECTRIC POWER)	
COMPANY FOR APPROVAL OF)	DOCKET NO. U-_____
TOLEDO BEND)	
HYDROELECTRIC POWER SALES)	
AGREEMENT)	

**JOINT APPLICATION OF ENTERGY LOUISIANA, LLC, CLECO POWER
LLC, AND SOUTHWESTERN ELECTRIC POWER COMPANY FOR
APPROVAL OF TOLEDO BEND HYDROELECTRIC POWER SALES AGREEMENT**

Entergy Louisiana, LLC (“ELL”); Cleco Power LLC (“CLECO”); and Southwestern Electric Power Company (“SWEPCO”) (collectively, the “Applicants”) respectfully submit this Joint Application seeking approval of the proposed power sales agreement (the “Proposed PSA”) entered into by the Sabine River Authority of Louisiana and the Sabine River Authority of Texas (collectively, the “Authorities”) and the Applicants.¹ This Joint Application, filed in accordance with the General Order of the Louisiana Public Service Commission (“LPSC” or the “Commission”) dated September 20, 1983 (the “1983 General Order”),² requests certification that the Applicants’ purchase of energy from the Toledo Bend hydroelectric facility on the terms set forth in the Proposed PSA serves the public convenience and necessity. In addition to certification under the 1983 General Order, but solely in an abundance of caution, the Applicants also request a finding that the public interest supports granting an exemption from compliance

¹ A copy of the Proposed PSA is attached as Exhibit 1 and is designated as Highly Sensitive Protected Material (“HSPM”).

² LPSC General Order dated September 20, 1983 (*In re: In the Matter of the Expansion of Utility Power Plant; Proposed Certification of New Plant by the LPSC*), as amended by General Order (Corrected) in Docket No. R-30517 (*In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exception for annual and seasonal liquidated damages block energy purchases*) dated May 27, 2009.

with the requirements of the Commission's Market-Based Mechanisms General Order (the "MBM Order") or, alternatively, accepting an alternative market test for the Proposed PSA.³ Although the total capacity under the Proposed PSA exceeds the 50 MW capacity threshold specified in the MBM Order (see ordering paragraph 2(a)), the amount of capacity allocated to each Applicant under the Proposed PSA in each case is less than the 50 MW threshold, and, accordingly, the MBM Order is arguably inapplicable. Finally, the Applicants request that the Joint Application be considered on an expedited basis.

BACKGROUND

This matter concerns the Toledo Bend Project, which was constructed by the Authorities primarily for the purposes of water supply, hydroelectric power generation, and recreation. The project provides hydroelectric generation to meet part of Louisiana's power requirements, resource diversity, and energy needs, and it also provides employment and recreation opportunities.

In February 1964, the Authorities entered into a 50-year agreement (running from May 1, 1968) with Gulf States Utility Company, Central Louisiana Electric Company, Inc., and Louisiana Power and Light Company (predecessors of the Applicants ELL and CLECO) for the sale of power generated by the Toledo Bend hydroelectric facility located on the Sabine River (the "Expired PSA"). On April 27, 2015, notice was provided to the Authorities that the other parties to the agreement did not wish for it to be automatically renewed under then-current terms, and the agreement expired on April 30, 2018.

³ General Order, Docket No. R-26172 Subdocket A, *In re: Development of Market-Based Mechanisms to Evaluate Proposals to Construct or Acquire Generating Capacity to Meeting Native Load, Supplements the September 20, 1983 General Order*, dated February 16, 2004 (as amended by General Order, Docket No. R-26172 Subdocket B, dated November 3, 2006, and further amended by the April 26, 2007 General Order, and the amendments approved by the Commission at its October 15, 2008 Business & Executive Meeting and now in recently issued General Order, Docket No. R-26172, Subdocket C dated October 29, 2008).

Before the agreement expired, the Authorities approached the Applicants and ultimately proposed and negotiated the Proposed PSA. Although not a party to the Expired PSA, SWEPCO was contacted and asked to participate in the Proposed PSA for the benefit of residents in the region. Under the Proposed PSA, which expires on May 31, 2023, the Applicants agree to purchase 80 megawatts of must-take, unit-contingent energy from the Toledo Bend hydroelectric facility, along with as-available capacity, capacity-related benefits, and environmental attributes. ELL's portion of the unit capacity and energy is 54%, with CLECO and SWEPCO each taking 23%.

In support of this Joint Application, the Applicants submit the Testimony by Affidavit of Paul J. Girard, III (Exhibit 3); the Affidavit of J. Robert Cleghorn (Exhibit 4); and the Affidavit of Thomas Brice (Exhibit 5).

COMPLIANCE WITH THE COMMISSION'S GENERAL ORDERS

The Proposed PSA is in the public interest because it would provide access to a diverse, renewable energy source on terms that are favorable to customers. Most notably, the terms of the Expired PSA have been changed such that the participating utilities are no longer obligated to operate and maintain the facility or bear the costs of such operation and maintenance. Based on this change and other key changes, the Proposed PSA will result in cost savings as compared to the Expired PSA.⁴

Additionally, although the Proposed PSA was not selected through a formal RFP process, it provides access to a renewable hydroelectric resource at a price that is expected to result in a lower dollar-per-megawatt-hour cost than a hydroelectric resource proposal that was submitted in the 2016 ELL Renewables Request for Proposals. Accordingly, the Applicants do not believe

⁴ A table explaining the key differences between the Expired PSA and the Proposed PSA is attached as Exhibit 2 and is designated as HSPM.

that a formal RFP process to further market-test the Proposed PSA is necessary for the Commission to determine that the Proposed PSA is consistent with the objective of providing access to diversified renewable energy sources at a reasonable cost. Further, as noted above, the MBM Order is arguably inapplicable because each Applicant's capacity allocation under the Proposed PSA is less than the 50 MW threshold specified in the MBM Order.

REQUEST FOR EXPEDITED TREATMENT

At the August 1, 2018 Business and Executive Meeting ("B&E"), the Commission directed the Applicants to submit a request for its consideration of the Proposed PSA no later than August 7, 2018, so that Commission Staff can use best efforts to facilitate an expedited proceeding and present the record and evidence at the October 2018 B&E. In so directing, the Commission acknowledged that the Proposed PSA is to be considered outside of the Administrative Hearings Division process. Accordingly, the Applicants request that the Commission exercise its original jurisdiction over this matter without the typical delays of the Administrative Hearings process by expediting its review of the Proposed PSA so that the Commission can consider this Joint Application at its October 2018 B&E. The Applicants also request a shortened intervention period of no more than 10 days.

SERVICE OF NOTICES AND PLEADINGS

The Applicants request that notices, correspondence, and other communications concerning this Application be directed to the following persons:

ELL

Mark D. Kleehammer
4809 Jefferson Highway
Mail Unit L-JEF-357
Jefferson, Louisiana 70121
Telephone: (504) 840-2528
Facsimile: (504) 840-2681
mkleeha@entergy.com

ELL

Lawrence J. Hand, Jr.
Michael J. Plaisance
639 Loyola Avenue
Mail Unit L-ENT-26E
New Orleans, Louisiana 70113
Telephone: (504) 576-4122
Facsimile: (504) 576-5579
lhand@entergy.com
mplaisa@entergy.com

CLECO

J. Robert Cleghorn
2030 Donahue Ferry Road
Pinesville, Louisiana 71360
Telephone: (318) 484-7637
Robert.cleghorn@cleco.com

CLECO

Daniel T. Pancamo
Phelps Dunbar, L.L.P.
365 Canal Street, Suite 2000
New Orleans, Louisiana 70130
Telephone: (504) 584-9265
Dan.pancamo@phelps.com

SWEPCO

Emile Cordaro
Regulatory Consultant
428 Travis St.
Shreveport, Louisiana 71101
ebcordaro@aep.com

SWEPCO

Bobby S. Gilliam
Jonathan P. McCartney
Wilkinson Carmody & Gilliam
400 Travis St., Suite 1700
Shreveport, Louisiana 71101
Telephone: (318) 221-4196
Fax: (318) 221-3705
bgilliam@wcglawfirm.com
jmccartney@wcglawfirm.com

The Applicants request that the foregoing persons be placed on the Official Service List for this proceeding and respectfully request that the Commission permit the designation of more than one person to be placed on the Official Service List for service in this proceeding.

REQUEST FOR CONFIDENTIAL TREATMENT

Exhibits 1 and 2 supporting this Joint Application contain information considered by the Applicants to be confidential and commercially sensitive and have been designated HSPM. Such confidential materials consist of competitively sensitive market information, the disclosure of which may create an artificial target for suppliers in an otherwise competitive wholesale market. The disclosure of such information to suppliers to the Applicants would subject not only the Applicants, but also their customers, to a substantial risk of harm. Accordingly, it is critical that this information remain confidential. Although the confidential and sensitive information and documents included with the Joint Application may be reviewed by appropriate representatives of the Commission Staff and intervenors pursuant to the terms and conditions of a suitable confidentiality agreement once such an agreement has been executed in this docket, this confidential information is being provided pursuant to the Commission's General Order dated August 31, 1992, and Rules 12.1 and 26 of the Rules of Practice and Procedure of the LPSC, which exempts information from public disclosure.

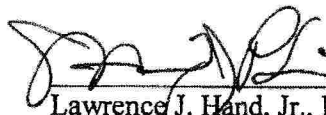
PRAYER FOR RELIEF

WHEREFORE, Entergy Louisiana, LLC; Cleco Power LLC; and Southwestern Electric Power Company respectfully request that the Commission, subject to the fullest extent of its jurisdiction, grant relief and give its approval as follows:

1. Find that the Proposed PSA serves the public convenience and necessity and is in the public interest, and is therefore prudent, in accordance with the Commission's 1983 General Order;
2. Find that the MBM Order does not apply to the Proposed PSA, as no jurisdictional utility would be taking more than 50 MW of capacity from the Toledo Bend hydroelectric facility or, in the alternative, (a) grant an exemption from compliance with the RFP process set forth in the MBM Order, or (b) accept the 2016 ELL Renewables Request for Proposals as an alternative market test for the Proposed PSA;


3. Declare that (a) all costs for ELL and CLECO associated with the Proposed PSA will continue to be recovered through the same mechanism as those similar costs were incurred under the Expired PSA; (b) SWEPCO is authorized to recover all costs incurred pursuant to the Proposed PSA through its Fuel Adjustment Clause, and all such costs be recovered from SWEPCO Louisiana jurisdictional customers; and (c) Applicants will make any adjustments necessary to remove from rates costs no longer incurred under the Proposed PSA;
4. Rule that, with respect to the Proposed PSA described in the Joint Application, the Applicants have complied with, or are not in conflict with, the provisions of all applicable LPSC Orders;
5. Find that the confidential testimony, exhibits, and other materials referenced in the Joint Application shall be exempt from public disclosure pursuant to the Commission's General Order dated August 31, 1992, and Rules 12.1 and 26 of the Rules of Practice and Procedure of the LPSC;
6. Direct that the period for interventions be shortened to no more than 10 days and that the Joint Application be considered at the Commission's October 2018 Business and Executive Meeting;
7. Direct that notice of all matters in these proceeding be sent to Mark Kleehammer, Lawrence Hand, Jr., Michael Plaisance, J. Robert Cleghorn, Daniel T. Pancamo, Emile Cordaro, Bobby Gilliam, and Jonathan McCartney, as representatives of the Applicants; and
8. Order such other general and equitable relief as to which the Applicants may show themselves to be entitled.

Respectfully submitted,



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Michael J. Plaisance, La. Bar No. 31288
639 Loyola Avenue
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Telephone: (504) 576-4122
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lhand@entergy.com
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Counsel for Applicant Entergy Louisiana, LLC



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Counsel for Applicant Cleco Power LLC



Bobby S. Gilliam, La. Bar No. 6227
Jonathan P. McCartney, La. Bar No. 31508
Patrick T. Wiggins, La. Bar No. 36727
WILKINSON, CARMODY & GILLIAM
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Telephone: (318) 221-4196
Fax: (318) 221-3705
bgilliam@wcglawfirm.com
jmccartney@wcglawfirm.com

Counsel for Applicant SOUTHWESTERN ELECTRIC POWER COMPANY

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: JOINT APPLICATION OF)	
ENTERGY LOUISIANA, LLC,)	
CLECO POWER LLC, AND)	
SOUTHWESTERN ELECTRIC)	DOCKET NO. U-_____
POWER COMPANY FOR)	
APPROVAL OF TOLEDO BEND)	
HYDROELECTRIC POWER)	
SALES AGREEMENT)	

EXHIBIT 1

**HIGHLY SENSITIVE
PROTECTED MATERIALS
FILED UNDER SEAL**

INTENTIONALLY OMITTED

AUGUST 2018

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: JOINT APPLICATION OF)	
ENTERGY LOUISIANA, LLC,)	
CLECO POWER LLC, AND)	
SOUTHWESTERN ELECTRIC)	DOCKET NO. U-_____
POWER COMPANY FOR)	
APPROVAL OF TOLEDO BEND)	
HYDROELECTRIC POWER)	
SALES AGREEMENT)	

EXHIBIT 2

**HIGHLY SENSITIVE
PROTECTED MATERIALS
FILED UNDER SEAL**

INTENTIONALLY OMITTED

AUGUST 2018

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC) DOCKET NO. U-_____
POWER COMPANY FOR)
APPROVAL OF TOLEDO BEND)
HYDROELECTRIC POWER)
SALES AGREEMENT)

EXHIBIT 3

TESTIMONY AFFIDAVIT
BY
PAUL J. GIRARD, III

AUGUST 2018

TESTIMONY BY AFFIDAVIT OF PAUL J. GIRARD, III

STATE OF LOUISIANA

PARISH OF JEFFERSON

NOW BEFORE ME, the undersigned authority, personally came and appeared **Paul J. Girard, III**, who after being duly sworn by me, did depose and say:

1. I am a person of the full age of majority and competent to make this affidavit.
2. I am employed by Entergy Louisiana, LLC ("ELL"), as the Director of Resource Planning and Market Operations. My responsibilities include overseeing ELL's resource and transmission planning, as well as its planning for Midcontinent Independent System Operator, Inc. ("MISO") market operations. In my role as Director of Resource Planning and Market Operations, I also serve as the Chairman of the ELL Operating Committee, which is responsible for making recommendations on transmission, generation, resource planning, and operations strategies to ELL's President and Chief Executive Officer. I also provide guidance to the President and Chief Executive Officer on recommended assumptions, planning methods, operating procedures, and approval policies to assist in determining the projects and priorities for ELL's construction budget and business plan. More specifically, I was involved in the negotiation of the proposed power sales agreement discussed below.

3. In February 1964, the Sabine River Authority of Louisiana and the Sabine River Authority of Texas (collectively, the "Authorities") entered into a 50-year agreement (running from May 1, 1968) with Gulf States Utility Company, Central Louisiana Electric Company, Inc., and Louisiana Power and Light Company for the sale of power generated by the Toledo Bend hydroelectric facility located on the Sabine River. On April 27, 2015, notice was provided to the

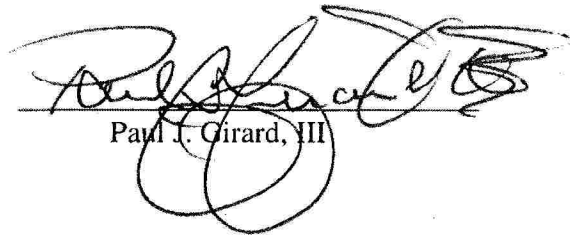
Authorities that the other parties to the agreement did not wish for it to be automatically renewed, and the agreement expired on April 30, 2018.

4. Before the agreement expired, the Authorities approached ELL and ultimately proposed and negotiated a new power sales agreement ("PSA"). This proposed PSA is between the Authorities and ELL, Cleco Power LLC ("CLECO"), and Southwestern Electric Power Company ("SWEPCO") (collectively, the "Companies"). Under the proposed PSA, which expires on May 31, 2023, the Companies agree to purchase 80 megawatts of must-take, unit-contingent energy from the Toledo Bend hydroelectric facility, along with as-available capacity, capacity-related benefits, and environmental attributes. ELL's portion of the unit capacity and energy is 54%, with CLECO and SWEPCO each taking 23%.

5. The proposed PSA would ensure ELL's continued access to a diverse, renewable energy source on terms that are favorable to ELL and its customers. Most notably, the terms of the expired PSA have been changed such that the participating utilities are no longer obligated to operate and maintain the facility or bear the costs of such operation and maintenance. Based on this change and other key changes, the proposed PSA will result in cost savings as compared to the expired PSA.

6. Additionally, the proposed PSA provides access to a renewable hydroelectric resource at a price that is expected to result in a lower dollar-per-megawatt-hour cost than a hydroelectric resource proposal that was submitted in the 2016 ELL Renewables Request for Proposals. Because ELL has this data point, I do not believe that it would be in the public interest or in the interest of ELL's customers to require a formal RFP before approving the proposed PSA.

7. To provide certainty on cost recovery, which is important to ELL and its customers, the Companies are requesting in their Joint Application that the Commission declare that all costs associated with the proposed PSA will continue to be recovered through the same mechanism as those similar costs were incurred under the expired PSA, and that the Companies will make any adjustments necessary to remove from rates costs no longer incurred under the proposed PSA.


Paul J. Girard, III

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 6th DAY OF AUGUST, 2018


NOTARY PUBLIC

My commission expires: at death



BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC) DOCKET NO. U-_____
POWER COMPANY FOR)
APPROVAL OF TOLEDO BEND)
HYDROELECTRIC POWER)
SALES AGREEMENT)

EXHIBIT 4

TESTIMONY AFFIDAVIT
BY
J. ROBERT CLEGHORN

AUGUST 2018

TESTIMONY BY AFFIDAVIT OF J. ROBERT CLEGHORN

STATE OF LOUISIANA

PARISH OF RAPIDES

NOW BEFORE ME, the undersigned authority, personally came and appeared **J. Robert Cleghorn**, who after being duly sworn by me, did depose and say:

1. I am a person of the full age of majority and competent to make this affidavit.
2. I am employed by Cleco Power LLC ("Cleco Power"). I am primarily responsible for developing the electric rates applicable throughout Cleco Power's service area and ensuring that the electric rates applicable throughout Cleco Power's service area are developed and implemented on a just, reasonable, and not unduly discriminatory basis. In that capacity, I oversee the preparation of revenue requirements and cost of service and rate design studies, as well as Cleco Power's load research and sales statistics processes that support those activities. I also coordinate and ensure the timely and accurate filing of certain periodic compliance filings at the Louisiana Public Service Commission ("LPSC" or "Commission"), including Cleco Power's monthly Environmental Adjustment Clause ("EAC") and Fuel Adjustment Clause ("FAC") factors and the annual cost of service, in accordance with Cleco Power's Formula Rate Plan ("FRP"), as approved by the Commission in Order No. U-32779, issued June 27, 2014. I also supervise Cleco Power's integrated resource planning function. More specifically, I was involved in the negotiation of the proposed power sales agreement discussed below.
3. In February 1964, the Sabine River Authority of Louisiana and the Sabine River Authority of Texas (collectively, the "Authorities") entered into a 50-year agreement (running from May 1, 1968) with Gulf States Utility Company, Central Louisiana Electric Company, Inc., and Louisiana Power and Light Company for the sale of power generated by the Toledo Bend

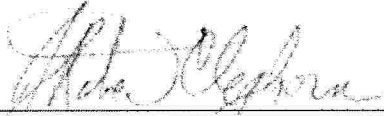
hydroelectric facility located on the Sabine River. On April 27, 2015, notice was provided to the Authorities that the other parties to the agreement did not wish for it to be automatically renewed, and the agreement expired on April 30, 2018.

4. Before the agreement expired, the Authorities approached Entergy Louisiana, LLC (“ELL”) and ultimately proposed and negotiated a new power sales agreement (“PSA”). This proposed PSA is between the Authorities and ELL, Cleco Power, and Southwestern Electric Power Company (“SWEPCO”) (collectively, the “Companies”). Under the proposed PSA, which expires on May 31, 2023, the Companies agree to purchase 80 megawatts of must-take, unit-contingent energy from the Toledo Bend hydroelectric facility, along with as-available capacity, capacity-related benefits, and environmental attributes. ELL’s portion of the unit capacity and energy is 54%, with CLECO and SWEPCO each taking 23%.

5. The proposed PSA would ensure Cleco Power’s continued access to a diverse, renewable energy source on terms that are favorable to Cleco Power and its customers. Most notably, the terms of the expired PSA have been changed such that the participating utilities are no longer obligated to operate and maintain the facility or bear the costs of such operation and maintenance. Based on this change and other key changes, the proposed PSA will result in cost savings as compared to the expired PSA.

6. To provide certainty on cost recovery, which is important to Cleco Power and its customers, the Companies are requesting in their Joint Application that the Commission declare that all costs associated with the proposed PSA will continue to be recovered through the same mechanism as those similar costs were incurred under the expired PSA, and that the Companies

will make any adjustments necessary to remove from rates costs no longer incurred under the proposed PSA.

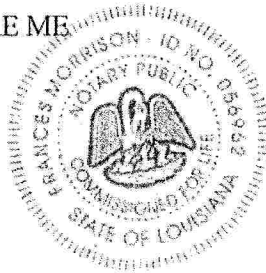


J. Robert Cleghorn
Vice President – Regulatory Strategy
Cleco Power LLC
2030 Donahue Ferry Road
Pineville, Louisiana 71360

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 7th DAY OF AUGUST, 2018



NOTARY PUBLIC



My commission expires: at death

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC) DOCKET NO. U-_____
POWER COMPANY FOR)
APPROVAL OF TOLEDO BEND)
HYDROELECTRIC POWER)
SALES AGREEMENT)

EXHIBIT 5

TESTIMONY AFFIDAVIT
BY
THOMAS P. BRICE

AUGUST 2018

TESTIMONY BY AFFIDAVIT OF THOMAS P. BRICE

STATE OF LOUISIANA

PARISH OF CADDO

NOW BEFORE ME, the undersigned authority, personally came and appeared **Thomas P. Brice**, who after being duly sworn by me, did depose and say:

1. I am a person of the full age of majority and competent to make this affidavit.

2. I am employed by Southwestern Electric Power Company (SWEPCO) as the Vice President of Regulatory and Finance. My responsibilities include overseeing SWEPCO's regulatory and financial strategy, the company's budgeting processes and the primary interface with SWEPCO's parent company, American Electric Power, for finance and regulatory activities. In my role as Vice President of Regulatory and Finance, I am responsible for SWEPCO's regulatory matters in Louisiana, Arkansas and Texas. More specifically, I was involved in the negotiation of the proposed power sales agreement discussed below.

3. The Sabine River Authority of Louisiana and the Sabine River Authority of Texas (collectively, the "Authorities") Authorities approached SWEPCO regarding participating in a new power sales agreement ("PSA"). This proposed PSA is between the Authorities and ELL, Cleco Power LLC ("CLECO"), and Southwestern Electric Power Company ("SWEPCO") (collectively, the "Companies"). Under the proposed PSA, which expires on May 31, 2023, the Companies agree to purchase 80 megawatts of must-take, unit-contingent energy from the Toledo Bend hydroelectric facility, along with as-available capacity, capacity-related benefits, and environmental attributes. SWEPCO's portion of the unit capacity and energy is 23%, with ELL and CLECO taking the remainder.


4. The proposed PSA would ensure SWEPCO's access to a diverse, local renewable energy source while benefiting ratepayers in the region and providing funding for the Toledo Bend Reservoir.

5. To provide certainty on cost recovery, which is important to SWEPCO and its customers, the SWEPCO is requesting in their Joint Application that the Commission declare that all costs associated with the proposed PSA be recovered through the SWEPCO's Fuel Adjustment Clause, and that SWEPCO be authorized to allocate and recover all costs associated with the PSA from its Louisiana jurisdictional customers.

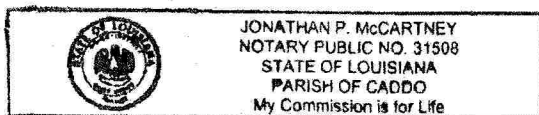


Thomas P. Brice

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 7 DAY OF AUGUST, 2018


NOTARY PUBLIC

My commission expires: at death



**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: JOINT APPLICATION OF)	
ENTERGY LOUISIANA, LLC,)	
CLECO POWER LLC, AND)	
SOUTHWESTERN ELECTRIC)	DOCKET NO. U-34966
POWER COMPANY FOR)	
APPROVAL OF TOLEDO BEND)	
HYDROELECTRIC POWER)	
SALES AGREEMENT)	

APPLICANTS' EXHIBIT 2 (*in globo*)

**HIGHLY SENSITIVE
PROTECTED MATERIALS
FILED UNDER SEAL**

**INTENTIONALLY
OMITTED**

OCTOBER 2018

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC)
POWER COMPANY FOR)
APPROVAL OF TOLEDO BEND)
HYDROELECTRIC POWER)
SALES AGREEMENT)**

DOCKET NO. U-34966

APPLICANTS' AND STAFF

JOINT EXHIBIT 1

OCTOBER 2018

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: JOINT APPLICATION OF)	
ENTERGY LOUISIANA, LLC,)	
CLECO POWER LLC, AND)	
SOUTHWESTERN ELECTRIC POWER)	
COMPANY FOR APPROVAL OF)	DOCKET NO. U-34966
TOLEDO BEND)	
HYDROELECTRIC POWER SALES)	
AGREEMENT)	

**UNOPPOSED JOINT MOTION FOR
ACCEPTANCE INTO THE RECORD OF PROPOSED UNCONTESTED STIPULATED
SETTLEMENT IN SUPPORT OF APPLICATION**

NOW COMES Entergy Louisiana, LLC (“ELL” or the “Company”); Cleco Power LLC (“CLECO”); Southwestern Electric Power Company (“SWEPCO”) (collectively, the “Applicants”) and Louisiana Public Service Commission (“LPSC” or “Commission”) Staff (“Staff”), through undersigned counsel, who respectfully request that the Hearing Examiner, Chief Administrative Law Judge Melanie Verzwylt, accept the Uncontested Stipulated Settlement Term Sheet (“Stipulation”), with supporting documentation as set forth below, into the record of this proceeding and submit same to the Commission for consideration at its October 26, 2018 Business and Executive Session (“B&E”). This filing is being made pursuant to the *Ruling on Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule* issued October 8, 2018. In support of this motion, Staff and Applicants submit as follows:

I.

This Commission, having been made aware that the Applicants had entered into the Proposed Power Sales Agreement (“PSA”) with the Sabine River Authority of Louisiana and the Sabine River Authority of Texas (collectively, the “Authorities”) to replace the previous agreement

which expired April 30, 2018, issued a directive at the August 1, 2018 B&E, directing the Applicants to submit a request on or before August 7, 2018 with all supporting documentation seeking Commission approval of the PSA. The Commission also directed Staff to use best efforts to facilitate an expedited proceeding, outside of the Administrative Hearings Division process, and present the record and evidence to the Commission for a decision at the October 26, 2018 B&E.

II.

On August 7, 2018, Applicants filed their *Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement* and accompanying Direct Testimony and Exhibits (“Joint Application”), pursuant to and in accordance with LPSC General Order dated September 20, 1983 (the “1983 General Order”).¹ The Joint Application was published in the Commission’s Official Bulletin No. 1173, dated August 10, 2018. Interventions were filed by the Louisiana Energy Users Group (“LEUG”), Marathon Petroleum Company (“Marathon”), and Packaging Corporation of America (“PCA”).

III.

After conducting discovery regarding the Proposed PSA, LPSC Staff and other Parties to this proceeding filed position statements on September 28, 2018 noting that they do not oppose the Applicants’ request, with LEUG and PCA each indicating that its non-opposition to the PSA is limited to the facts and circumstances presented in the PSA. Marathon is the only party to this proceeding that did not file a statement of position. However, Marathon has authorized the

¹ LPSC General Order dated September 20, 1983 (*In re: In the Matter of the Expansion of Utility Power Plant; Proposed Certification of New Plant by the LPSC*), as amended by General Order (Corrected) in Docket No. R-30517 (*In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exception for annual and seasonal liquidated damages block energy purchases*) dated May 27, 2009.

Applicants to state that it supports the Commission's approval of the Proposed PSA. Therefore, no Party opposes the Applicants' request.

IV.

On October 5, 2018, Staff and the Applicants filed a *Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule*, which included a revised schedule allowing for a paper proceeding in lieu of an in-person hearing, in order to comply with the Commission's August 1, 2018 directive. Judge Verzwylvelt acting as Hearing Examiner issued a *Ruling on Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule* on October 8, 2018, granting the motion and revising the procedural schedule to facilitate the presentation of the record and evidence to the Commission for a decision at the October 26, 2018 B&E.

V.

Following additional meetings and discussions regarding Staff's proposed conditions, the Parties subsequently executed the Stipulation, effective October 12, 2018.

VI.

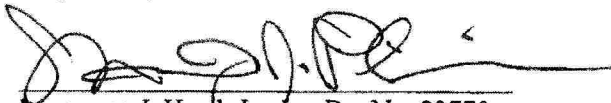
The Applicants and Staff present as the record in support of the Application in this matter the following exhibits that have been stipulated to by all parties to this proceeding:

Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement (Public Version)	Applicants' Exhibit 1, in globo
Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement (Confidential Version)	Applicants' Exhibit 2, in globo
Unopposed Joint Motion for Acceptance into the Record of Proposed Uncontested Stipulated Settlement in Support of Application	Applicants' and Staff Joint Exhibit 1
Uncontested Stipulated Settlement Term Sheet	Applicants' and Staff Joint Exhibit 2

Applicants' Affidavits in Support of Stipulation	Applicants' Exhibit 3, in globo
Position Statements on behalf of Staff, LEUG and PCA	Applicants' and Staff Joint Exhibit 3

WHEREFORE, Entergy Louisiana, LLC, Cleco Power LLC, Southwestern Electric Power Company and Louisiana Public Service Commission Staff, respectfully request that the Hearing Examiner accept the stipulated exhibits listed above as the record in support of the Application in this matter and submit that record to the Commission for consideration at its October 26, 2018 Business and Executive Session, pursuant to the *Ruling on Joint Prehearing Statement and Unopposed Motion to Revise Procedural Schedule* issued October 8, 2018.

Respectfully submitted,



Lawrence J. Hand, Jr., La. Bar No. 23770

Michael J. Plaisance, La. Bar No. 31288

639 Loyola Avenue

Mail Unit L-ENT-26E

New Orleans, Louisiana 70113

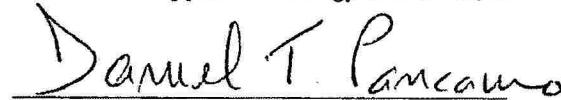
Telephone: (504) 576-4122

Facsimile: (504) 576-5579

lhand@entergy.com

mplaisa@entergy.com

Counsel for Applicant Entergy Louisiana, LLC



Daniel T. Pancamo, La. Bar No. 19726

Phelps Dunbar, L.L.P.

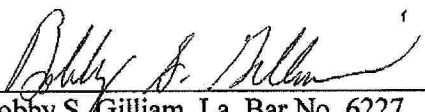
365 Canal Street, Suite 2000

New Orleans, Louisiana 70130

Telephone: (504) 584-9265

Dan.pancamo@phelps.com

Counsel for Applicant Cleco Power LLC


Bobby S. Gilliam, La. Bar No. 6227
Jonathan P. McCartney, La. Bar No. 31508
Patrick T. Wiggins, La. Bar No. 36727
WILKINSON, CARMODY & GILLIAM
400 Travis Street, Suite 1700
Shreveport, Louisiana 71101
Telephone: (318) 221-4196
Fax: (318) 221-3705
bgilliam@wcglawfirm.com
jmccartney@wcglawfirm.com

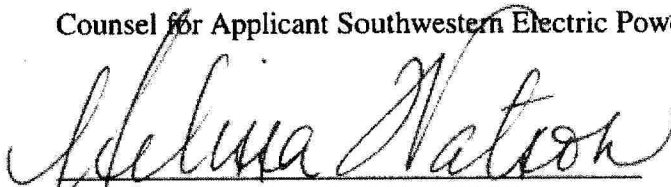
Counsel for Applicant Southwestern Electric Power Company

Melissa Watson (Bar Roll No. 28261)
Deputy General Counsel
Louisiana Public Service Commission
P.O. Box 91154
Baton Rouge, Louisiana 70821-9154
602 North Fifth Street, Galvez Bldg., 12th Fl.
Baton Rouge, Louisiana 70802
Ph. (225) 342-9888
melissa.watson@la.gov

Counsel for Louisiana Public Service Commission

Bobby S. Gilliam, La. Bar No. 6227
Jonathan P. McCartney, La. Bar No. 31508
Patrick T. Wiggins, La. Bar No. 36727
WILKINSON, CARMODY & GILLIAM
400 Travis Street, Suite 1700
Shreveport, Louisiana 71101
Telephone: (318) 221-4196
Fax: (318) 221-3705
bgilliam@wglawfirm.com
jmccartney@wglawfirm.com

Counsel for Applicant Southwestern Electric Power Company

A handwritten signature in cursive script, reading "Melissa Watson", is written over a horizontal line.

Melissa Watson (Bar Roll No. 28261)
Deputy General Counsel
Louisiana Public Service Commission
P.O. Box 91154
Baton Rouge, Louisiana 70821-9154
602 North Fifth Street, Galvez Bldg., 12th Fl.
Baton Rouge, Louisiana 70802
Ph. (225) 342-9888
melissa.watson@la.gov

Counsel for Louisiana Public Service Commission

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC)
POWER COMPANY FOR)
APPROVAL OF TOLEDO BEND)
HYDROELECTRIC POWER)
SALES AGREEMENT)**

DOCKET NO. U-34966

APPLICANTS' AND STAFF

JOINT EXHIBIT 2

OCTOBER 2018

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: JOINT APPLICATION OF)	
ENTERGY LOUISIANA, LLC,)	
CLECO POWER LLC, AND)	
SOUTHWESTERN ELECTRIC POWER)	
COMPANY FOR APPROVAL OF)	DOCKET NO. U-34966
TOLEDO BEND)	
HYDROELECTRIC POWER SALES)	
AGREEMENT)	

UNCONTESTED STIPULATED SETTLEMENT TERM SHEET

Entergy Louisiana, LLC (“ELL” or “Company”); Cleco Power LLC (“CLECO”); Southwestern Electric Power Company (“SWEPCO”) (collectively, the “Applicants”) and the Staff of the Louisiana Public Service Commission (“LPSC” or “the Commission”) hereby agree to settle and resolve the captioned matter upon the following terms, which shall be presented to the Commission for approval:

1. The proposed power sales agreement (“Proposed PSA”) entered into by the Sabine River Authority of Louisiana and the Sabine River Authority of Texas (collectively, the “Authorities”) and the Applicants serves the public convenience and necessity and is in the public interest, and is therefore prudent, in accordance with the Commission’s 1983 General Order.¹
2. The MBM Order does not apply to the Proposed PSA, as no jurisdictional utility would be taking more than 50 MW of capacity from the Toledo Bend hydroelectric facility or, in the alternative, (a) public interest supports granting an exception to the MBM Order, or (b) the

¹ LPSC General Order dated September 20, 1983 (*In re: In the Matter of the Expansion of Utility Power Plant; Proposed Certification of New Plant by the LPSC*), as amended by General Order (Corrected) in Docket No. R-30517 (*In re: Possible modifications to the September 20, 1983 General Order to allow (1) for more expeditious certifications of limited-term resource procurements and (2) an exception for annual and seasonal liquidated damages block energy purchases*) dated May 27, 2009.

2016 ELL Renewables Request for Proposals is accepted as an alternative market test for the Proposed PSA.

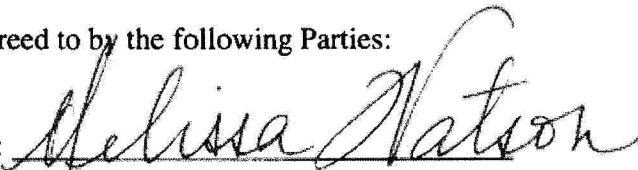
3. With respect to the Proposed PSA described in the Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement, the Applicants have complied with, or are not in conflict with, the provisions of all applicable LPSC Orders with respect to approval of the resource.
4. All costs for ELL and CLECO associated with the Proposed PSA will continue to be recovered through the same mechanism as those similar costs were incurred under the Expired PSA;² SWEPCO is authorized to recover all costs incurred pursuant to the Proposed PSA through its Fuel Adjustment Clause ("FAC"), and all such costs be recovered from SWEPCO Louisiana jurisdictional customers; and Applicants will make any adjustments necessary to remove from rates costs no longer incurred under the Proposed PSA.
5. Any monetary benefits derived from the Proposed PSA as a result of the receipt of capacity-related benefits, energy, other electric products and environmental attributes, or any monetary benefit derived as a result of the renewable nature of the product, shall be passed to Applicants' retail customers via the respective FACs pursuant to each's allocated share under the Proposed PSA.
6. The Proposed PSA remains subject to prudence review in subsequent rate and/or fuel clause audit proceedings with respect to the Applicants' obligations to prudently implement

² In February 1964, the Authorities entered into a 50-year agreement (running from May 1, 1968) with Gulf States Utility Company, Central Louisiana Electric Company, Inc., and Louisiana Power and Light Company (predecessors of the Applicants ELL and CLECO) for the sale of power generated by the Toledo Bend hydroelectric facility located on the Sabine River (the "Expired PSA").

implement and manage the Proposed PSA consistent with the objective of providing reliable service at lowest reasonable cost.

7. Except as may be expressly stated, any Order in this matter shall have no precedential effect in any other proceedings involving issues similar to those resolved herein and shall be without prejudice to the right of any party, Staff or Commission to take any position on any such similar issue in future proceedings, including formula rate plan proceedings, base rate proceedings, or in other regulatory proceedings or appeals therefrom.

Agreed to by the following Parties:

By: 

**REPRESENTING
LOUISIANA PUBLIC SERVICE COMMISSION STAFF**

By: _____

**REPRESENTING
ENTERGY LOUISIANA, LLC**

By: _____

**REPRESENTING
CLECO POWER LLC**

By: _____

**REPRESENTING
SOUTHWESTERN ELECTRIC POWER COMPANY**

and manage the Proposed PSA consistent with the objective of providing reliable service at lowest reasonable cost.

7. Except as may be expressly stated, any Order in this matter shall have no precedential effect in any other proceedings involving issues similar to those resolved herein, including with respect to cost recovery treatment of capacity associated with the resource, and shall be without prejudice to the right of any party, Staff or Commission to take any position on any such similar issue in future proceedings, including formula rate plan proceedings, base rate proceedings, or in other regulatory proceedings or appeals therefrom.

Agreed to by the following Parties:

By: _____

**REPRESENTING
LOUISIANA PUBLIC SERVICE COMMISSION STAFF**

By:  _____

**REPRESENTING
ENTERGY LOUISIANA, LLC**

By: Daniel T. Pincano

**REPRESENTING
CLECO POWER LLC**

By: _____

**REPRESENTING
SOUTHWESTERN ELECTRIC POWER COMPANY**

and manage the Proposed PSA consistent with the objective of providing reliable service at lowest reasonable cost.

7. Except as may be expressly stated, any Order in this matter shall have no precedential effect in any other proceedings involving issues similar to those resolved herein, including with respect to cost recovery treatment of capacity associated with the resource, and shall be without prejudice to the right of any party, Staff or Commission to take any position on any such similar issue in future proceedings, including formula rate plan proceedings, base rate proceedings, or in other regulatory proceedings or appeals therefrom.

Agreed to by the following Parties:

By: _____

**REPRESENTING
LOUISIANA PUBLIC SERVICE COMMISSION STAFF**

By: _____

**REPRESENTING
ENTERGY LOUISIANA, LLC**

By: Daniel T. Pincus

**REPRESENTING
CLECO POWER LLC**

By: Bobby S. Gillman

**REPRESENTING
SOUTHWESTERN ELECTRIC POWER COMPANY**

The following parties do not oppose the foregoing Uncontested Stipulated Settlement Term Sheet:

By: 

**REPRESENTING
LOUISIANA ENERGY USERS GROUP**

By: _____

**REPRESENTING
MARATHON PETROLEUM COMPANY**

By: _____

**REPRESENTING
PACKAGING CORPORATION OF AMERICA**

**REPRESENTING
LOUISIANA ENERGY USERS GROUP**

By: John H. Chavanne

**REPRESENTING
MARATHON PETROLEUM COMPANY**

By: _____

**REPRESENTING
PACKAGING CORPORATION OF AMERICA**

The following parties do not oppose the foregoing Uncontested Stipulated Settlement Term Sheet:

By: _____

**REPRESENTING
LOUISIANA ENERGY USERS GROUP**

By: _____

**REPRESENTING
MARATHON PETROLEUM COMPANY**

By: C. R. T.

**REPRESENTING
PACKAGING CORPORATION OF AMERICA**

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC)
POWER COMPANY FOR)
APPROVAL OF TOLEDO BEND)
HYDROELECTRIC POWER)
SALES AGREEMENT)**

DOCKET NO. U-34966

APPLICANTS' EXHIBIT 3 (*in globo*)

OCTOBER 2018

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

**APPLICATION OF ENTERGY LOUISIANA,)
LLC FOR APPROVAL OF NATURAL GAS)
COST STABILIZATION PILOT PROGRAM,)
TRANSACTION PARAMETERS,)
AND OTHER RELIEF)**

DOCKET NO. U-34735

STATE OF LOUISIANA

PARISH OF JEFFERSON

AFFIDAVIT OF JONATHAN R. BOURG

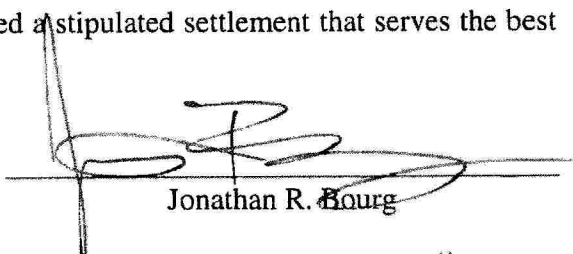
BEFORE ME, the undersigned authority, personally came and appeared, Jonathan R. Bourg, Director, Regulatory Affairs for Entergy Louisiana, LLC ("ELL" or the "Company"), who after being duly sworn, did depose and state:

1.

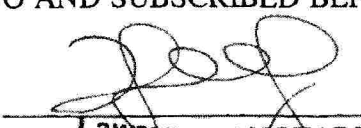
I hereby certify that the document attached as the Uncontested Stipulated Settlement Term Sheet is a true and correct copy of the settlement between the Louisiana Public Service Commission ("LPSC" or "Commission") Staff and ELL in the above captioned proceeding.

2.

After extensive review, discovery, negotiations, and collaboration between Commission Staff, Consultants, and ELL, the parties have reached a stipulated settlement that serves the best interests of customers and ELL.


Jonathan R. Bourg

SWORN TO AND SUBSCRIBED BEFORE ME, Notary Public, on this the 11 day of October, 2018.



Lawrence J. Hane Jr.
Bar 23770 / Notary 52176
Notary Public in and for the
State of Louisiana.
My Commission is for Life.

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN RE: JOINT APPLICATION OF)
ENTERGY LOUISIANA, LLC,)
CLECO POWER LLC, AND)
SOUTHWESTERN ELECTRIC POWER)
COMPANY FOR APPROVAL OF)
TOLEDO BEND)
HYDROELECTRIC POWER SALES)
AGREEMENT)**

DOCKET NO. U-34966

STATE OF LOUISIANA

PARISH OF RAPIDES

AFFIDAVIT OF J. ROBERT CLEGHORN

BEFORE ME, the undersigned authority, personally came and appeared, J. Robert Cleghorn, Vice President – Regulatory Strategy, for Cleco Power LLC (“Cleco Power” or the “Company”), who after being duly sworn, did depose and state:

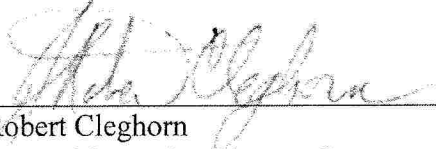
I.

I hereby certify that the document attached as the Uncontested Stipulated Settlement Term Sheet (“Stipulation”) is a true and correct copy of the settlement between the Louisiana Public Service Commission (“LPSC” or “Commission”) Staff and Cleco Power in the above captioned proceeding. I hereby further certify that I have due power and authority to accept the foregoing settlement on behalf of Cleco Power, and to make the representations provided in this Affidavit.

II.

After reviewing the statements of positions filed by LPSC Staff, as well as the Louisiana Energy Users Group and Packaging Corporation of America, Cleco Power accepts the conditions that Staff recommended in its statement of position, which conditions are reflected in the

attached Stipulation. Accordingly, the parties have reached a stipulated settlement that serves the best interests of customers and Cleco Power.



J. Robert Cleghorn
Vice President – Regulatory Strategy
Cleco Power LLC
2030 Donahue Ferry Road
Pineville, LA 71360

SWORN TO AND SUBSCRIBED BEFORE ME, Notary Public, on this the 12th day of October, 2018.



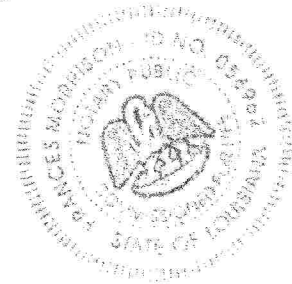
NOTARY PUBLIC

Frances Morrison

(print name)

Notary ID/Bar Roll No.: 056962

My Commission Expires: at death



**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: JOINT APPLICATION OF)	
ENTERGY LOUISIANA, LLC,)	
CLECO POWER LLC, AND)	
SOUTHWESTERN ELECTRIC POWER)	
COMPANY FOR APPROVAL OF)	DOCKET NO. U-34966
TOLEDO BEND)	
HYDROELECTRIC POWER SALES)	
AGREEMENT)	

STATE OF LOUISIANA

PARISH OF CADDO

AFFIDAVIT OF THOMAS P. BRICE

BEFORE ME, the undersigned authority, personally came and appeared, Thomas P. Brice, Vice President of Regulatory and Finance for Southwestern Electric Power Company ("SWEPCO" or the "Company"), who after being duly sworn, did depose and state:

I.

I hereby certify that the document attached as the Uncontested Stipulated Settlement Term Sheet ("Stipulation") is a true and correct copy of the settlement between the Louisiana Public Service Commission ("LPSC" or "Commission") Staff and SWEPCO in the above captioned proceeding.

II.

SWEPCO has reviewed and accepts the terms and conditions of the attached Stipulation. Accordingly, the parties have reached a stipulated settlement that serves the best interests of customers and SWEPCO.



Thomas P. Brice

SWORN TO AND SUBSCRIBED BEFORE ME, Notary Public, on this the 11th day of
October, 2018.



NOTARY PUBLIC

BRETT MATTISON
NOTARY PUBLIC, Bossier Parish, Louisiana
My Commission is For Life
Notary 003863

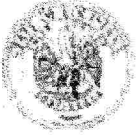
**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

IN RE: JOINT APPLICATION OF) ENTERGY LOUISIANA, LLC,) CLECO POWER LLC, AND) SOUTHWESTERN ELECTRIC) POWER COMPANY FOR) APPROVAL OF TOLEDO BEND) HYDROELECTRIC POWER) SALES AGREEMENT)	DOCKET NO. U-34966
---	---------------------------

**APPLICANTS' AND STAFF
JOINT EXHIBIT 3**

OCTOBER 2018

Louisiana Public Service Commission



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BRANDON M. FREY
Executive Secretary
Executive Counsel

JOHNNY E. SNELLGROVE, JR.
Deputy Undersecretary

September 28, 2018

COMMISSIONERS

Eric F. Skrmetta, Chairman
District I
Mike Francis, Vice Chairman
District IV
Foster L. Campbell
District V
Lambert C. Boissiere, III
District III
Craig Greene
District II

VIA HAND DELIVERY

Ms. Terri Bordelon
Louisiana Public Service Commission
Records and Recordings
602 N. Fifth Street
Galvez Building, 12th Floor
Baton Rouge, LA 70802

2018 SEP 28 PM 4:20
LA PUBLIC SERVICE
COMMISSION

**Re: Docket No. U-34966 Entergy Louisiana, LLC, Cleco Power LLC and
Southwestern Electric Power Company**

Dear Ms. Bordelon:

Enclosed please find a *Position Statement on behalf of Commission Staff* for the above referenced docket.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Melissa Watson
Deputy General Counsel

MW/kst
Encl.

cc: Service List

**BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION**

DOCKET NO. U-34966

**ENTERGY LOUISIANA, LLC, CLECO POWER LLC AND SOUTHWESTERN
ELECTRIC POWER COMPANY**

2018 SEP 28 PM 4:20
LA PUBLIC SERVICE
COMMISSION

In re: Joint Application for Approval of Toledo Bend Hydroelectric Power Sales Agreement.

POSITION STATEMENT ON BEHALF OF COMMISSION STAFF

Louisiana Public Service Commission Staff ("Staff") submits this Position Statement pursuant to the procedural schedule set forth in the Report of Initial Status Conference issued September 6, 2018 by Chief Administrative Law Judge Verzwylvelt acting as Hearing Examiner in this matter.

I. BACKGROUND AND PROCEDURAL HISTORY

At the Commission's Business and Executive Session held August 1, 2018, the Louisiana Public Service Commission ("LPSC" or "Commission") issued the following unopposed directive at the request of Vice Chairman Francis:

The Toledo Bend Reservoir was created in the 1960s in order to provide power generation, flood control, and recreational activities to residents and visitors of Louisiana and Texas. During that time, this Commission approved a 50-year agreement involving the Toledo Bend hydroelectric facility located on the Sabine River between the Sabine River Authorities of Louisiana and Texas and Cleco, Gulf States Utilities, and Louisiana Power & Light. Although that agreement expired in May of this year, the Sabine River Authorities are selling power to Entergy Louisiana, Cleco, and SWEPCO under a new short-term, interim agreement. I am advised the parties have executed a new agreement not to exceed a five year term that must be submitted to the Commission for approval. I am also advised that on prior occasions the Commission considered modifications to the Toledo Bend agreement without proceeding through the Administrative Hearings Division. Accordingly, I direct Entergy Louisiana, Cleco, and SWEPCO to submit a request with all supporting documentation to the Commission no later than August 7 seeking approval of the contract. Additionally, I direct that the request be noticed in the August 10 bulletin with a ten day intervention period. In lieu of the

Administrative Hearings Division process, I direct Staff to utilize best efforts to facilitate an expedited proceeding and present the record and evidence to the Commission for a decision at its October 26, 2018 Business & Executive Meeting regarding whether the new agreement regarding the Toledo Bend hydroelectric facility would continue to serve the public interest.¹

Pursuant to the Commission's directive, Entergy Louisiana, LLC ("ELL"), Cleco Power LLC ("Cleco") and Southwestern Electric Power Company ("Swepeco") (collectively the "Applicants") filed the Joint Application of Entergy Louisiana, LLC, Cleco Power LLC and Southwestern Electric Power Company for Approval of Toledo Bend Hydroelectric Power Sales Agreement ("Joint Application") on August 7, 2018. Notice of this matter was published in the Commission's Official Bulletin dated August 10, 2018 for a 10-day intervention period. Louisiana Energy Users' Group, Packaging Corporation of America, and Marathon Petroleum Company intervened. Sabine River Authority of Louisiana and Sabine River Authority of Texas are interested parties in this matter. The Hearing Examiner conducted a status conference on September 5, 2018 at which the parties discussed a proposed schedule that was adopted and set forth in the Notice of Initial Status Conference.

II. COMMISSION JURISDICTION

The jurisdiction of the Commission is set forth the Louisiana Constitution, Article IV, Section 21, provide:

The Commission shall regulate all common carriers and public utilities and have such other regulatory authority as provided by law. It shall adopt and enforce reasonable rules, regulations, and procedures necessary for the discharge of its duties, and shall have other powers and perform other duties as provided by law.

¹ Louisiana Public Service Commission Minutes from August 1, 2018 Open Session, Exhibit 18.

Pursuant to its Constitutional authority, the Commission adopted the Commission's General Order dated September 20, 1983 and the General Order (Corrected) dated May 27, 2009 in Docket No. R-30517, which amended the General Order dated September 20, 1983 (hereinafter referred to collectively as the "1983 General Order"). The 1983 General Order requires a utility to obtain the Commission's approval of, among other things, any project to construct or purchase new generating resources, and requires advance certification from the Commission that the proposed project serves the public convenience and necessity:

No electric public utility subject to the jurisdiction of the Commission shall commence any on site construction activity or enter into any contract for construction or conversion of electric generating facilities or contract for the purchase of capacity or electric power, other than emergency or economy powered purchases, as well as the exemption listed in Paragraph 7(a), without first having applied to the Commission for a certification that the public convenience and necessity would be served through completion of such project or confection of such contract. Feasibility and engineering studies, site acquisition and related activities preliminary to a determination of the desirability or need for plant construction or conversion on purchase power contracts are exempted from this requirement.

III. JOINT APPLICATION

The Joint Application requests 1983 General Order certification of the proposed Power Sales Agreement ("Proposed PSA") between Applicants and the Sabine River Authority of Louisiana and the Sabine River Authority of Texas ("Authorities") which own the Toledo Bend hydroelectric facility ("Toledo Bend Project").² Additionally, out of an abundance of caution, Applicants seek an exemption from the Commission's Market-Based Mechanisms General Order, General Order dated October 29, 2008 in Docket No. R-26172, Subdocket C ("MBM Order"), or in the alternative, accept an alternative market test as permitted by the MBM Order. The Proposed PSA replaces a 50-year agreement between Cleco and ELL predecessors which began May 1, 1968 and expired on April 30, 2018 ("Expired PSA"). The Proposed PSA, which expires May 31, 2023, "requires Applicants to purchase 80 MW of must-take, unit-contingent energy from the Toledo

² The Proposed PSA is designated as highly sensitive protected material by Applicants and was filed pursuant to 12.1 of the Commission's Rules of Practice and Procedure as commercially sensitive and confidential.

Bend [Project], along with as-available capacity, capacity-related benefits, and environmental attributes.”³ Under the Proposed PSA, ELL’s share is 54% with Cleco and Swepeco each taking 23%.

The Joint Application is supported by the Affidavits of Paul J. Girard, III for ELL; J. Robert Cleghorn for Cleco; and Thomas Brice for Swepeco. The Joint Application and supporting Affidavits state that the Proposed PSA provides costs savings as opposed to the Expired PSA and is in the public interest as it would provide “access to a diverse, renewable energy source on terms that are favorable to customers.”⁴ Affiant Brice notes that Toledo Bend is a local resource and not only would it benefit ratepayers in the region, it provides funding for the Toledo Bend Reservoir.⁵ The Proposed PSA eliminates operation and maintenance obligations and expenses that were required under the Expired PSA. Further, though not selected through a formal RFP process, the Proposed PSA is “expected to result in a lower dollar per megawatt hour cost” than another hydroelectric proposal submitted into ELL’s 2016 Renewables RFP.⁶ Applicants assert that the 2016 Renewables RFP serves as market test for the Proposed PSA as an alternative to a formal RFP process. Moreover, that the MBM is altogether inapplicable as each of the Applicant’s shares under the Proposed PSA is less than the 50MW threshold triggering the MBM.

Key specific findings Applicants seek in the Joint Application are as follows:

1. Find that the Proposed PSA serves the public convenience and necessity and is in the public interest, and is therefore prudent, in accordance with the Commission’s 1983 General Order;

³ Joint Application at 3.

⁴ *Id.*; Girard Affidavit at 2; Cleghorn Affidavit at 2.

⁵ Brice Affidavit at 2.

⁶ Joint Application at 3; Girard Affidavit at 2.

2. Find that the MBM Order does not apply to the Proposed PSA, as no jurisdictional utility would be taking more than 50 MW of capacity from the Toledo Bend hydroelectric facility or, in the alternative, (a) grant an exemption from compliance with the RFP process set forth in the MBM Order, or (b) accept the 2016 ELL Renewables Request for Proposals as an alternative market test for the Proposed PSA;
3. Declare that (a) all costs for ELL and CLECO associated with the Proposed PSA will continue to be recovered through the same mechanism as those similar costs were incurred under the Expired PSA; (b) SWEPCO is authorized to recover all costs incurred pursuant to the Proposed PSA through its Fuel Adjustment Clause, and all such costs be recovered from SWEPCO Louisiana jurisdictional customers; and (c) Applicants will make any adjustments necessary to remove from rates costs no longer incurred under the Proposed PSA;
4. Rule that, with respect to the Proposed PSA described in the Joint Application, the Applicants have complied with, or are not in conflict with, the provisions of all applicable LPSC Orders; and
5. Find that the confidential testimony, exhibits, and other materials referenced in the Joint Application shall be exempt from public disclosure pursuant to the Commission's General Order dated August 31, 1992, and Rules 12.1 and 26 of the Rules of Practice and Procedure of the LPSC.

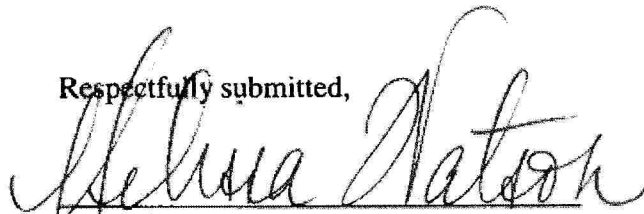
IV. STAFF POSITION

Staff has reviewed the Joint Application with exhibits and responses to data requests. Having considered the information provided therein, the Commission's history in supporting the Expired PSA, as well as Commission Orders approving other renewable resource purchase power

agreements, the Staff recommends that the Commission approve the requests for relief enumerated above subject to the following conditions:

1. Any monetary benefits derived from the Proposed PSA as a result of the receipt of capacity-related benefits, energy, other electric products and environmental attributes, or any other monetary benefit derived as a result of the renewable nature of the product, shall be passed to Applicants' retail customers via the respective Fuel Adjustment Clauses ("FACs") pursuant to each's allocated share under the Proposed PSA.
2. The Proposed PSA remains subject to prudence review in subsequent rate and/or fuel clause audit proceedings with respect to the Applicants' obligations to prudently implement and manage the Proposed PDA consistent with the objective of providing reliable service at lowest reasonable cost.
3. Except as may be expressly stated any Order in this matter shall have no precedential effect in any other proceedings involving issues similar to those resolved herein and shall be without prejudice to the right of any party, Staff or the Commission to take any position on any such similar issue in future proceedings, including FRP proceedings, base rate proceedings or in other regulatory proceedings or appeals therefrom.

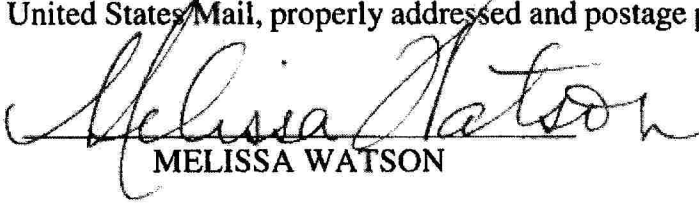
Respectfully submitted,



Melissa Watson (Bar Roll No. 28261)
Deputy General Counsel
Louisiana Public Service Commission
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Baton Rouge, Louisiana 70821-9154
602 North Fifth Street, Galvez Bldg., 12th Fl.
Baton Rouge, Louisiana 70802
Ph. (225) 342-9888
melissa.watson@la.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon all parties of record by email, fax or United States Mail, properly addressed and postage prepaid, on this September 28, 2018.


MELISSA WATSON

**Service List for U-34966
as of 9/28/2018**

Commissioners

Eric Skrmetta, Commissioner
Foster L. Campbell, Commissioner
Lambert C Boissiere III., Commissioner
Mike Francis, Commissioner
Craig Greene, Commissioner

LPSC Staff Counsel

Melissa Watson, Deputy General Counsel

LPSC Staff

Robin Pendergrass, LPSC Auditing Division
Donnie Marks, LPSC Utilities Division

Applicant:

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Entergy Louisiana, LLC

Entergy Louisiana, LLC

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Southwestern Electric Power Company

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Intervenor: Marathon Petroleum Company, LP

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c/o Chavanne Enterprises
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Marland L. Turner
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Packaging Corporation of America and Louisiana Energy Users Group

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Interested Party: Sabine River Authority of Louisiana and the Sabine River Authority of Texas

Interested Party: **Sabine River Authority of Louisiana and the Sabine River Authority of Texas**

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RANDY YOUNG, PARTNER
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September 28, 2018

Ms. Melissa Watson
Louisiana Public Service Commission
602 North Fifth Street, 12th Floor
Baton Rouge, Louisiana 70802

VIA ELECTRONIC AND U.S. MAIL

RE: Joint Application for Approval of Toledo Bend Hydroelectric Power
Sales Agreement; LPSC Docket No. U-34966
KM File No. 4388-321

Dear Melissa:

The Louisiana Energy Users Group ("LEUG") has determined that it does not oppose the Toledo Bend renewable resource proposal presented in this proceeding under the facts and circumstances in which it has been presented. LEUG has for many years supported Commission policies and rules that require electric utilities to pursue the lowest reasonable cost of power for the benefit of their customers. Ratepayers in Louisiana benefit from power purchases by electric public utilities that are at or below wholesale market rates. LEUG is opposed to adoption of any Commission policies that require above-market power purchases and maintains all of its rights to review and oppose any and all resource requests and proposals that may be presented to the Commission for approval in future proceedings.

Very truly yours,

A handwritten signature in black ink, appearing to read "Randy Young".

Randy Young

JRY/tjh

cc: Official Service List



CARRIE R. TOURNILLON, PARTNER
PH 504.585.3056 DIRECT FAX 504.620.3385
CARRIE.TOURNILLON@KEANMILLER.COM

September 28, 2018

Ms. Melissa Watson
Louisiana Public Service Commission
602 North Fifth Street, 12th Floor
Baton Rouge, Louisiana 70802

VIA HAND DELIVERY AND
ELECTRONIC MAIL

RE: Joint Application for Approval of Toledo Bend Hydroelectric Power
Sales Agreement; LPSC Docket No. U-34996
KM File No. 9418-65

Dear Melissa:

We submit this statement of position on behalf of Packaging Corporation of America ("PCA"). PCA has determined that it does not oppose the Toledo Bend renewable resource power supply agreement ("PSA") presented in this proceeding under the facts and circumstances in which it has been presented. However, PCA has concerns with approval of the PSA considering Cleco Power's lack of capacity need. Further, PCA is opposed to adoption of any Commission policies that require above-market power purchases. PCA's decision not to oppose the PSA is based on the facts and circumstances surrounding the proposed PSA, and PCA maintains all of its rights to review and oppose any and all resource requests and proposals that may be presented to the Commission for approval in future proceedings. PCA requests that any order approving the PSA be conditioned on the approval being limited to the facts and circumstances of the PSA and non-precedential for any future PSAs.

Very truly yours,

A handwritten signature in black ink, appearing to read "C-R-T", followed by the printed name "Carrie R. Tournillon".

Carrie R. Tournillon

CRT/

cc: Official Service List

Service List for U-34966
as of 10/12/2018

Commissioners

Eric Skrmetta, Commissioner
Foster L. Campbell, Commissioner
Lambert C Boissiere III., Commissioner
Mike Francis, Commissioner
Craig Greene, Commissioner

LPSC Staff Counsel

Melissa Watson, Deputy General Counsel

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Robin Pendergrass, LPSC Auditing Division
Donnie Marks, LPSC Utilities Division

Applicant:

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Entergy Louisiana, LLC

Entergy Louisiana, LLC

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Southwestern Electric Power Company

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Intervenor:

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Packaging Corporation of America and Louisiana Energy Users Group

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Interested Party:

Sabine River Authority of Louisiana and the Sabine River Authority of Texas

Interested Party:

Sabine River Authority of Louisiana and the Sabine River Authority of Texas

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